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6 *United Specialty Insurance Company*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 US EXPRESS CARRIERS, LLC,

11 Plaintiff,

12 vs.

13 UNITED SPECIALTY INSURANCE  
COMPANY; PENSKE TRUCK LEASING  
14 COMPANY, L.P; PENSKE TRUCK  
LEASING CORPORATION; JAMES PARKS,  
15 III,

16 Defendant(s).

Case No. 2:23-cv-00307-GMN-BNW

**STIPULATION AND ORDER TO EXTEND  
THE DEADLINE FOR UNITED  
SPECIALTY INSURANCE COMPANY TO  
FILE ITS RESPONSIVE PLEADING**

**(First Request)**

17 Defendant, UNITED SPECIALTY INSURANCE COMPANY (hereinafter "USIC"), and  
18 Plaintiff, US EXPRESS CARRIERS, LLC ("Plaintiff"), by and through their respective counsel of  
19 record, hereby stipulate and agree to extend the deadline for USIC to file a responsive pleading to  
20 Plaintiff's Amended Complaint for Declaratory Relief by thirty (30) days, from April 11, 2023 to  
21 May 10, 2023. This is the parties' first request for extension of the deadline.

22 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the  
23 requested extension, as counsel for USIC has only recently been retained to represent USIC in this  
24 matter and is in the process of reviewing the file materials and information necessary to respond to  
25 the allegations set forth in the Amended Complaint. Accordingly, the parties agree that the  
26 requested extension furthers the interests of this litigation and is not being requested in bad faith or  
27 to delay these proceedings unnecessarily.  
28

1 The failure to file this stipulation on or before the original responsive pleading deadline of  
2 April 11, 2023 was the result of excusable neglect, as undersigned counsel for USIC had not yet  
3 been retained.

4 DATED this 24th day of April, 2023.

5 **WILSON, ELSER, MOSKOWITZ,**  
6 **EDELMAN & DICKER LLP**

7 /s/ Chad C. Butterfield  
8 Chad C. Butterfield, Esq.  
9 Nevada Bar No. 10532  
10 6689 Las Vegas Blvd. South, Suite 200  
11 Las Vegas, NV 89119  
12 *Attorneys for Defendant United Specialty*  
13 *Insurance Company*

14 DATED this 24th day of April, 2023.

15 **THORNDAL ARMSTRONG, PC**

16 /s/ Bruce Scott Dickinson  
17 Bruce Scott Dickinson, Esq.  
18 Nevada Bar No. 2297  
19 1100 E. Bridger Avenue  
20 Las Vegas, NV 89101  
21 *Attorney for Plaintiff US Express Carriers,*  
22 *LLC*

23 **ORDER**

24 **IT IS SO ORDERED**

25 **DATED:** 9:55 am, April 26, 2023

26 

27 **BRENDA WEKSLER**  
28 **UNITED STATES MAGISTRATE JUDGE**